

Commander Eighth Coast Guard District Hale Boggs Federal Bldg. 501 Magazine Street New Orleans, LA 70130-3396 Staff Symbol: (moc) Phone: (504) 589-6193 FAX: (504) 589-4999

16711/MODU July 14, 1999

Mr. Byron L. Halbleib Project Manager Global Marine Drilling Company 777 N. Eldridge Road P.O. Box 4379 Houston, TX 77210-4379

Dear Mr. Halbleib:

This is in response to your letter of January 11, 1999 requesting that M/V GLOMAR EXPLORER's fire safety booklet be considered equivalent to a posted fire safety drawing as required by 46 CFR 109.563(a). After carefully evaluating your arguments and the applicable laws and regulations, I have decided to grant your request.

The general arrangement drawing depicting certain safety items and systems is required to be posted in a conspicuous location by both international (SOLAS 74 Chapter II-2/20.1) and U.S. regulations (46 CFR 109.563(a)). While SOLAS 74 II-2/20.1 also allows the Administration to accept a booklet such as yours in lieu of posting the general arrangement/safety plan, U.S. regulations are silent about this option.

The information provided in your Safety Plan Book contains all information required to be posted in 46 CFR 109.563. I agree that the vital information provided in this book will enhance the ability of the vessel's crew to effectively respond to shipboard emergencies and, as long as the book is readily available to key crew members, will be equivalent to posting this information.

If you have any questions, please feel free to contact Lieutenant Commander Mike Brown at (504) 589-6743.

Sincerely,

C. T. DESMOND

Captain, U.S. Coast Guard Chief, Marine Safety Division By direction of the Commander Eighth Coast Guard District

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